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Final
Cleanup Action Plan

Old Inland Pit Site
Spokane, WA

Washington Department of Ecology
Toxics Cleanup Program
Eastern Regional Office
Spokane, WA

115464

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1.0 INTRODUCTION

This report presents the selected cleanup action for the Old Inland Pit Site (Site), located at 3500 N. Sullivan St., Spokane, Washington (figure 1). This Draft Cleanup Action Plan (DCAP) is required as part of the site cleanup process established by Washington State Department of Ecology (Ecology) under Ch.70.105D RCW Model Toxics Control Act (MTCA). The cleanup action is based on the Phase I Remedial Investigation (RI) conducted by Dames & Moore on behalf of CH&E Investments and Spokane Industries, the potentially liable persons (PLPs).

This cleanup action plan will outline the following:

- The history of operations, ownership, and disposal activities at the Site;
- The nature and extent of contamination as presented in the RI;
- Establish cleanup levels for the Site; and
- Determine the appropriate remediation strategy.

1.1 Declaration

Ecology has selected this remedy because it will be protective of human health and the environment. Furthermore, the selected remedy is consistent with the preference of the State of Washington as stated in RCW 70.105D.030(1)(b) for permanent solutions.

1.2 Applicability

Cleanup levels specified in this cleanup action plan are applicable only to the Old Inland Pit Site. They were developed as a part of an overall remediation process under Ecology oversight using the authority of MTCA, and should not be considered as setting precedents for other sites.

1.3 Administrative Record

The documents used to make the decisions discussed in this cleanup action plan are on file in the administrative record for the Site. These documents are listed in the reference section. The administrative record for the Site is available for public review by appointment at Ecology's Eastern Regional Office, located at N. 4601 Monroe Street, Spokane, WA 99205-1295.

1.4 Applicability of CERCLA and MTCA

Old Inland Pit was placed on the National Priorities List (NPL) in 1986 by the U.S. Environmental Protection Agency (EPA) under authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). EPA and Ecology agreed that Ecology would assume lead agency status of the site. A Memorandum of Agreement (1994) between EPA and Ecology gives Ecology responsibility for all aspects of the remedial investigation, feasibility study, remedial design, remedial action and community relations activities at state lead sites. Through the agreement between Washington State and EPA, the cleanup action of the Site is done under MTCA authority. The cleanup action will meet EPA's mandate that remedial actions at NPL sites comply with promulgated federal and more stringent state standards.

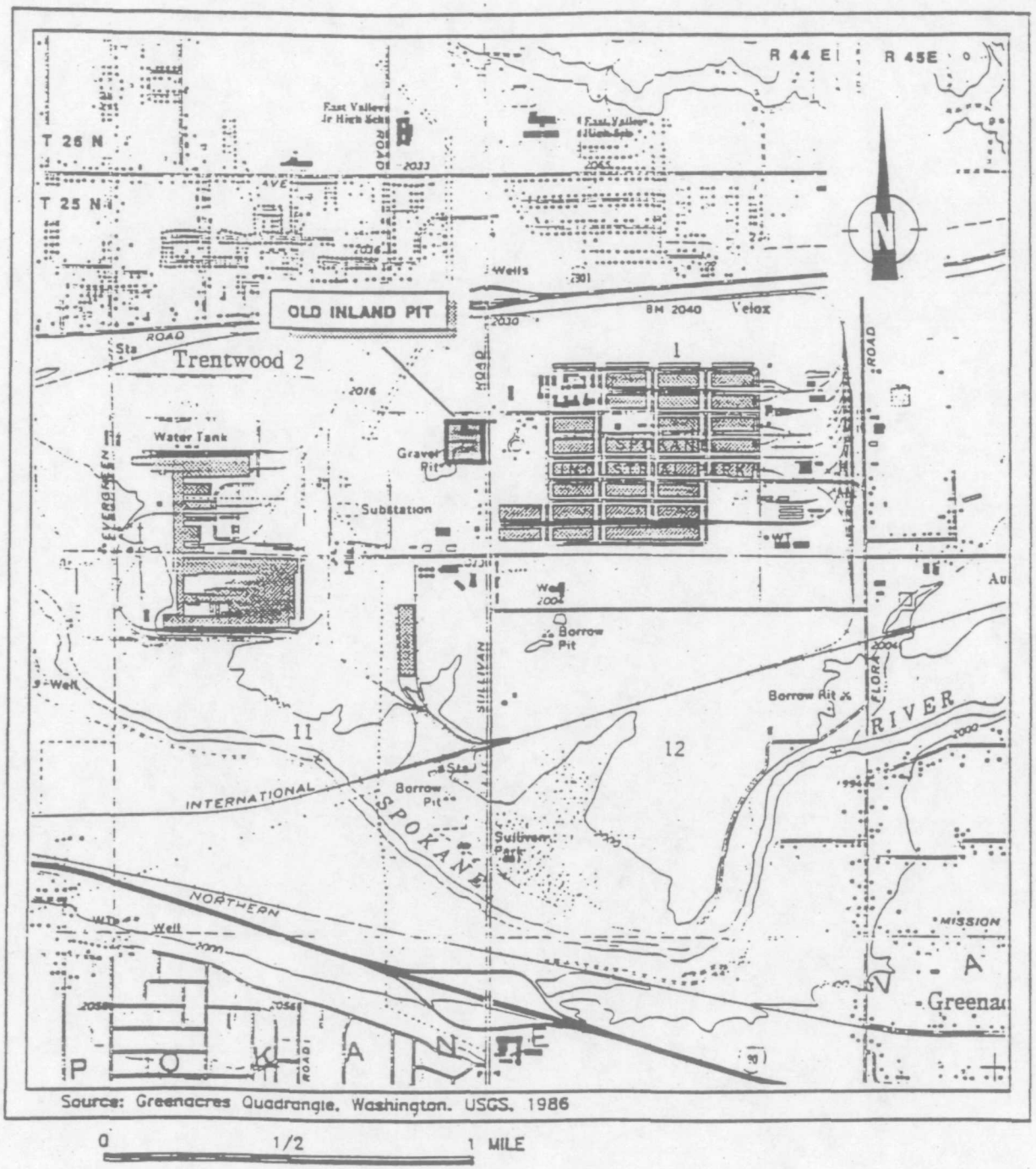

Figure 1: Location of Old Inland Pit Site

2.0 SITE HISTORY

The ten-acre Site was operated by Inland Asphalt as a sand and gravel source from 1969 to 1978. Materials were excavated to a depth of 35 to 50 ft. below ground surface. Spokane Steel Foundry Company (SSFC), located just east of the pit, disposed of waste foundry sands and baghouse dust from May 1978 to May 1983. The sands were from metal molding operations, and the baghouse dust was generated from sand sieving and sandblasting operations and the residue of electric arc furnaces. Approximately 200 tons of baghouse dust was thought to have been disposed of in the pit. Foundry sand disposal continued until 1986.

In addition to the foundry dusts, permission was also given to Central Premix to dispose of construction debris and to Quarry Tile Company for disposal of broken decorative clay tiles. Combined dumping from all sources raised the bottom level of the pit to a uniform 35 feet below ground surface.

3.0 SITE INVESTIGATIONS

In May, 1983, Ecology collected baghouse dust samples from the SSFC plant for waste classification due to concerns that the waste might be dangerous. The material passed the EP Toxicity test, but failed the Static Acute Fish Toxicity test and was classified a state-only dangerous waste under the authority of WAC 173-303.

In August, 1984, Ecology & Environment (E&E) conducted a Preliminary Site Assessment (PSA) for the EPA, which consisted of interviews with SSFC personnel, a site visit, and soil sampling. PSAs are done to estimate threats posed by sites to human health and the environment. Elevated concentrations of copper, zinc, nickel, and chromium were detected. The results of the PSA were used to complete a Hazard Ranking System (HRS) scoring. The HRS score prompted the nomination of the Site to the NPL in 1986.

In July, 1986, Reed Corporation was contracted by CH&E to collect data to confirm samples and provide additional site characterization. E&E performed additional soil sample collection in late 1988 for the EPA.

E&E, under contract to Ecology, collected additional soil samples and installed four groundwater monitoring wells in May of 1991 (figure 2). Groundwater samples were collected from these wells in May 1991 and April 1993.

On April 20, 1995, after public notice and opportunity to comment, the PLPs entered into an Agreed Order with Ecology (No. DE 95TC-E101) to perform a Phase I Remedial Investigation. Dames & Moore began site investigations on behalf of the PLPs. Further soil sampling was performed. Groundwater samples were taken in January 1995, March 1996, June 1996, and September 1996. Additional dust samples were also collected from the pit floor in September 1995 for a second Static Acute Fish Toxicity test. Those test

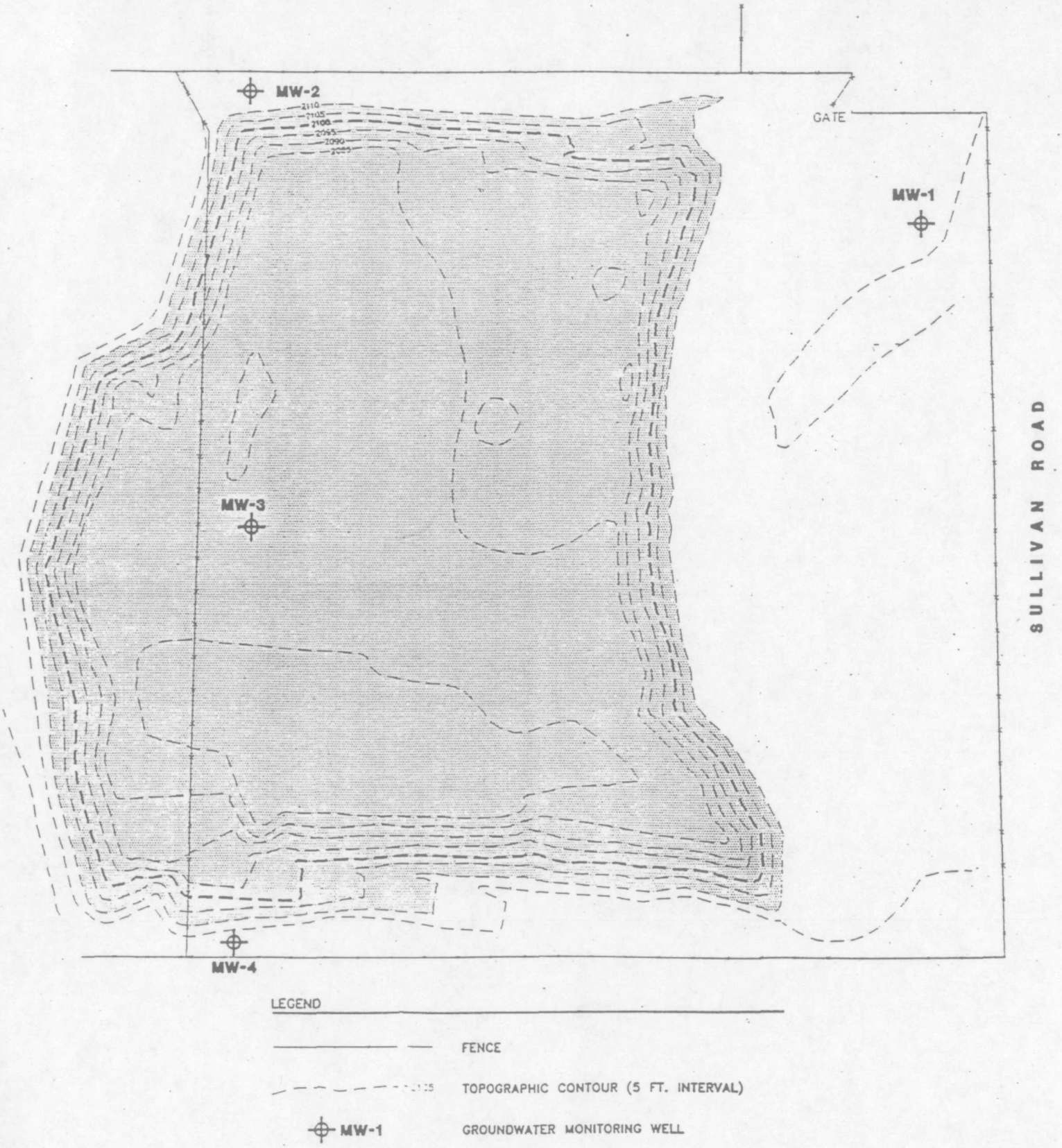

Figure 2: Location of monitoring wells

results indicated the waste would no longer be characterized as a state dangerous waste. The complete history of site investigations and sampling results is presented in the RI (Dames & Moore, 1998).

4.0 SUMMARY OF ENVIRONMENTAL ISSUES

4.1 Groundwater

The Site overlies the Spokane Valley-Rathdrum Prairie Aquifer, the sole source of water for the greater Spokane area. The aquifer is prolific and unconfined, with groundwater flowing from the northeast to the southwest towards the Spokane River. Groundwater at the site is about 65 to 70 feet below ground surface.

4.2 Soil

Materials at depth and near the surface are comprised of native sands and gravels. The surficial soils are a mixture of native deposits and backfilled material, including the foundry sands and baghouse dust. The bulk of the baghouse dust was deposited in the northeast and south central areas of the pit.

4.3 Risks to Human Health and the Environment

Human health risks are determined by exposure and toxicity. Exposure to hazardous substances at the Site requires information on potential pathways and receptors. MTCA uses standard assumptions on the characteristics of the receptor to evaluate risks from hazardous substances.

The Site is located in an industrially-zoned area, surrounded by industrial properties all currently used in an industrial capacity. Future use of the Site and the surrounding properties is expected to remain similar to current usage. Therefore, no residential or commercial exposure scenarios are anticipated.

Contaminants of potential concern at the Site include metals and non-metallic elements such as aluminum, copper, zinc, iron, arsenic, and magnesium. These elements are present in varying concentrations in the soils on-site. Vegetation in the form of weeds and grasses covers most of the soil surface, limiting the potential for windblown soil transport.

A direct contact pathway exists between people and surface soils. Although a fence surrounds the Site restricting access, future workers have the potential to be in direct contact with soils down to a depth of 15 feet. WAC 173-340-740(6)(c) specifies that 15 feet is a "reasonable estimate of the depth of soil that could be excavated and distributed at the soil surface as a result of site development activities."

Groundwater below the Site has the potential to be affected by downward filtration of surface water through contaminated soils. However, sampling indicates that groundwater

has not been contaminated and that leaching is not occurring. Therefore, the potential for ingestion of contaminated water due to Site materials is unlikely.

Surface water is channeled to the pit floor where it percolates downward. Due to the nature of the soils, precipitation does not pond on or run off the surface. Transport of contaminated soils off-site via surface water is unlikely due to these features. Contact with temporarily ponded surface waters might happen during an extended precipitation event. Surface waters are not a permanent site feature; thus it represents an insignificant pathway.

5.0 CLEANUP STANDARDS

A requirement of MTCA is the establishment of cleanup standards for individual sites. Cleanup standards are comprised of cleanup levels and points of compliance. Cleanup levels development involves the selection of indicator hazardous substances. Cleanup levels are based on the concentrations of those indicator substances above which human health and the environment are threatened. Those concentrations are determined using risk-based exposure equations defined in MTCA. Three methods are available for establishing site-specific cleanup levels: Method A, Method B, and Method C. Method A is used for routine sites or sites that involve relatively few hazardous substances which have available numerical levels. Method B is the standard method for determining cleanup levels and is applicable to all sites. Method C is a conditional method used when a cleanup level under Method A or B is technically impossible to achieve or may cause greater environmental harm. Method C may also be applied to qualifying industrial properties.

The point of compliance is then established as the location where the cleanup levels must be achieved before the Site is no longer considered a threat to human health and the environment.

5.1 Indicator Hazardous Substances

MTCA defines the factors used to determine whether a substance should be retained as an indicator for the site. When defining cleanup levels at a site contaminated with several hazardous substances, Ecology may eliminate from consideration those contaminants that contribute a small percentage of the overall threat to human health and the environment. WAC 173-340-708(2)(b) outlines that a substance may be eliminated from consideration based on:

- The frequency of detection. If a compound is detected at a frequency of 5% or less, it may be appropriate to eliminate it;
- The concentration of the substance. Substances with concentrations marginally above their cleanup standards may not be important in considerations of overall hazard and risk;
- The toxicity of the substance. It may be suitable to delete substances of low toxicity;

- Environmental fate. Substances that readily degrade in the environment may not be of importance to overall hazard or risk. Conversely, those with highly-toxic degradation products should be included in an analysis of overall hazard and risk;
- The natural background levels of the substance. MTCA regulates risks due to substances found at contaminated waste sites. The risks caused by substances at background concentrations are not addressed by MTCA;
- The mobility and potential for exposure to the substance. Substances may be eliminated if the values for these factors are low.

5.2 Method Analysis

Soil and groundwater are the two potentially contaminated media at the Site. Cleanup levels are based on estimates of the highest beneficial use for ground and surface water, and the reasonable maximum exposure for soils, expected to occur under both current and potential future site use conditions.

5.2.1 Groundwater

Since the Spokane-Rathdrum Aquifer flows beneath the site, drinking water is the highest beneficial use of groundwater. Although currently no drinking water is pumped in the vicinity of the Site, it is considered a potential future source of groundwater. According to WAC 173-340-720(3)(a), Method B cleanup levels are applicable to groundwater at the Site.

5.2.2 Soil

Direct contact or ingestion is the mostly likely exposure pathway for site soils. Consideration of current and future site use leads to the conclusion that human exposure via these routes will be in an industrial setting. The criteria for selecting industrial soil cleanup levels are specified in WAC 173-340-745(1)(b) and are as follows:

- Zoned for industrial use by a city or county conducting land use planning under the Growth Management Act;
- Institutional controls are in place. A restrictive covenant is placed on the property limiting its use to industrial purposes;
- Hazardous substances remaining at the property do not pose a threat to human health or the environment at the Site.

Based on these criteria, Method C Industrial cleanup levels are applicable to Site soils.

5.3 Cleanup Levels

5.3.1 Groundwater

Table 1 shows the applicable cleanup criteria for analytes detected in site groundwater. The most stringent of these criteria is the selected Method B cleanup level for each substance. The method A value for lead is based on protection of blood lead levels in children, and was used because there are no Method B levels.

Table 1: Applicable Groundwater Cleanup Criteria

Analyte	Federal MCL			MTCA	
	Concentration, ug/L	Cancer Risk	Hazard Quotient	Concentration, ug/L	Basis
Metals/Non-Metallic Elements					
silver	50		0.625	80	BNCAR
aluminum					
arsenic	50	8.58E-04		0.0583	BCAR
boron				1440	BNCAR
barium	2000		1.7857143	1120	BNCAR
beryllium	4	2.00E-04		0.02	BCAR
calcium					
cadmium	5		0.625	8	BNCAR
cobalt					
chromium	100		0.00625	16000	BNCAR
copper	1300		2.1959459	592	BNCAR
iron					
potassium					
magnesium					
manganese				2240	BNCAR
molybdenum				80	BNCAR
sodium					
nickel	100		0.3125	320	BNCAR
lead	15			5	A
antimony				6.4	BNCAR
selenium				80	BNCAR
strontium				9600	BNCAR
thallium	2		1.7857143	1.12	BNCAR
titanium					
vanadium				112	BNCAR
zinc				4800	BNCAR

BNCAR - Method B, non-carcinogen
BCAR - Method B, carcinogen
A - Method A

Table 2 shows the analytes detected in groundwater along with the maximum concentrations and frequencies of detection. Maximum concentrations are based on water sampling done in 1991, 1993, 1995, and 1996. Contaminants with concentrations less than the individual cleanup level, those with 5% or less detection frequency, and those with no toxicity data are eliminated from consideration as indicator substances. No samples exceed MTCA criteria, thus none of the detected analytes are indicator substances, and groundwater has not been impacted by activities at the site.

5.3.2 Soil

Applicable soil cleanup criteria for the Site are shown in table 3. Since the Site meets the requirements of an industrial property, Method C Industrial values were applied unless no value existed. Lead was the only analyte where no Method C Industrial soil value was available, so a Method A Industrial value was applied. In the case of aluminum and cobalt, no levels were available from MTCA, so an EPA Region 9 Preliminary Remediation Goal (PRG) was used.

Table 4 presents the screening for indicator substances in soils. Since there are no indicator substances in groundwater, soil cleanup levels protective of groundwater are not considered. Again, contaminants with concentrations less than the individual cleanup level, those with 5% or less detection frequency, and those with no toxicity data are eliminated from consideration as indicator substances. Aluminum was detected only once above the EPA PRG by 27%, but that result represented less than 5% of the total number of results. Therefore, aluminum was eliminated from further consideration. Based on these criteria, no analytes detected in soil are indicator substances.

5.4 Point of Compliance

MTCA defines the Point of Compliance as the point or points where cleanup levels shall be attained. Once cleanup levels are met at the point of compliance, the site is no longer considered a threat to human health or the environment. Since there are no indicator hazardous substances, no point of compliance for soil or groundwater needs to be established.

6.0 Proposed Cleanup Actions

The RI identified no release of hazardous substances at levels of concern to human health and the environment. There are no exceedances according to Method B groundwater and Method C Industrial soil cleanup levels.

To comply with Method C Industrial exposure assumptions, a restrictive covenant has been placed with the deed for the property limiting its use to industrial purposes. This is the only action required at the site to protect human health and the environment, in accordance with MTCA.

Table 2: Indicator Substance Screening, Groundwater

Analyte	Frequency of Detection	Maximum Concentration, ug/L	MTCA Cleanup Level, ug/L	Basis	Screening Results
Metals/Non-Metallic Elements					
silver	0.0	ND	50	MCL	<=5% detection frequency
aluminum	0.12	84			no toxicity data
arsenic	0.04	4.1	0.058	BCAR	<5% above cleanup level
boron	1.0	96	1440	BNCAR	below cleanup level
barium	1.0	71.4	1120	BNCAR	below cleanup level
beryllium	0.0	ND	0.02	BCAR	<=5% detection frequency
calcium	1.0	9.12E+04			no toxicity data
cadmium	0.0	ND	5	MCL	<=5% detection frequency
cobalt	0.0	ND			<=5% detection frequency
chromium	0.12	130	1.60E+04	BNCAR	below cleanup level
copper	0.13	10	592	BNCAR	below cleanup level
iron	0.0	ND			<=5% detection frequency
potassium	1.0	2900			no toxicity data
magnesium	1.0	2.47E+04			no toxicity data
manganese	0.21	150	2240	BNCAR	below cleanup level
molybdenum	0.0	ND	80	BNCAR	<=5% detection frequency
sodium	1.0	6770			no toxicity data
nickel	0.0	ND	100	MCL	<=5% detection frequency
lead	0.04	3.54	5	A	<=5% detection frequency
antimony	0.0	ND	6.4	BNCAR	<=5% detection frequency
selenium	0.0	ND	80	BNCAR	<=5% detection frequency
strontium	1.0	239	9600	BNCAR	below cleanup level
thallium	0.0	ND	1.12	BNCAR	<=5% detection frequency
titanium	0.0	ND			<=5% detection frequency
vanadium	0.0	ND	112	BNCAR	<=5% detection frequency
zinc	0.0	ND	4800	BNCAR	<=5% detection frequency

BNCAR - Method B, non-carcinogen
BCAR - Method B, carcinogen
A - Method A
MCL - Federal Maximum Contaminant Level
ND - not detected

Table 3: Applicable Soil Cleanup Criteria

Analyte	MTCA			EPA PRG, mg/kg	Background, mg/kg
	Method A Industrial, mg/kg	Method C Industrial, mg/kg	Basis		
Metals/Non-Metallic Elements					
silver		1.75E+04	NCAR		
aluminum				1.00E+05	2.14E+04
arsenic	200	219	CAR		9
boron		3.15E+05	NCAR		
barium		2.45E+05	NCAR		0.8
beryllium		30.5	CAR		1
calcium					
cadmium	10	3500	NCAR		18
cobalt				9.70E+04	
chromium	500	3.50E+06	NCAR		22
copper		1.30E+05	NCAR		2.50E+04
iron					0.02
potassium					
magnesium					
manganese		4.90E+05	NCAR		700
molybdenum		1.75E+04	NCAR		
sodium					16
nickel		7.00E+04	NCAR		15
lead	1000				
antimony		1400	NCAR	6800	
selenium		1.75E+04	NCAR		
strontium		2.10E+06	NCAR		
thallium		245	NCAR		
titanium					
vanadium		2.45E+04	NCAR		
zinc		1.05E+06	NCAR		66
Pesticides					
aroclor-1254		70	NCAR		
dieldrin		8.2	CAR		
4,4'-DDE		386	CAR		
4,4'-DDT	5	386	CAR		
methoxychlor		1.75E+04	NCAR		
alpha-chlordane		101	CAR		

NCAR - non-carcinogen
CAR - carcinogen

Table 3: Applicable Soil Cleanup Criteria

Analyte	MTCA			EPA PRG, mg/kg	Background, mg/kg
	Method A Industrial, mg/kg	Method C Industrial, mg/kg	Basis		
Volatiles					
dichloromethane	0.5	1.75E+04	CAR		
acetone		3.50E+05	NCAR		
2-butanone		2.10E+06	NCAR		
benzene	0.5	4530	CAR		
4-methyl-2-pentanone					
2-hexanone					
toluene	40	7.00E+05	NCAR		
chlorobenzene		7.00E+04	NCAR		
total xylenes	20	7.00E+06	NCAR		
Semivolatiles					
bis(2-ethylhexyl)phthalate		9380	CAR		
anthracene		1.05E+06	NCAR		
dibenzofuran					
phenanthrene					
fluoranthene		1.40E+05	NCAR		
pyrene		1.05E+05	NCAR		
benzo(a)anthracene		18	CAR		
chrysene		18	CAR		
phenol		2.10E+06	NCAR		
2-methylphenol		1.75E+05	NCAR		
4-methylphenol		1.75E+04	NCAR		
benzoic acid		1.40E+07	NCAR		
naphthalene		1.40E+05	NCAR		
2-methylnaphthalene					
fluorene		1.40E+05	NCAR		
benzo(b-k)fluoranthene		18	CAR		
benzo(a)pyrene		18	CAR		

NCAR - non-carcinogen
CAR - carcinogen

Table 4: Indicator Substance Screening, Soils

Analyte	Frequency of Detection	Maximum Concentration, mg/kg	MTCA Cleanup Level, mg/kg	Basis	Screening Results
Metals/Non-Metallic Elements					
silver	0.12	3.2	1.75E+04	NCAR	below cleanup level
aluminum	1.0	1.27E+05	1.00E+05	EPA PRG	<5% above cleanup level
arsenic	0.68	44.5	219	CAR	below cleanup level
barium	1.0	9.06E+04	2.45E+05	NCAR	below cleanup level
beryllium	0.59	0.88	30.5	NCAR	below cleanup level
cadmium	0.37	2.3	3500	CAR	below cleanup level
calcium	1.0	2.83E+04			no toxicity data
chromium	1.0	1280	1.75E+04	NCAR	below cleanup level
cobalt	0.71	91.1	9.70E+04	EPA PRG	below cleanup level
copper	1.0	111	1.30E+05	NCAR	below cleanup level
iron	1.0	6.88E+04			no toxicity data
mercury	0.29	0.12	1050	NCAR	below cleanup level
potassium	1.0	3040			no toxicity data
magnesium	1.0	8790			no toxicity data
manganese	1.0	1.50E+04	4.90E+05	NCAR	below cleanup level
sodium	1.0	3920			no toxicity data
nickel	1.0	123	7.00E+04	NCAR	below cleanup level
lead	0.99	282	1000	A	below cleanup level
antimony	0.15	6.8	1400	NCAR	below cleanup level
selenium	0.21	21.2	1.75E+04	NCAR	below cleanup level
thallium	0.30	22.4	245	NCAR	below cleanup level
vanadium	1.0	63	2.45E+04	NCAR	below cleanup level
zinc	1.0	513	1.05E+06	NCAR	below cleanup level
Pesticides					
aroclor-1254	0.17	0.02	70	NCAR	below cleanup level
dieldrin	0.05	0.073	8.2	CAR	<=5% detection frequency
4,4'-DDE	0.05	0.025	386	CAR	<=5% detection frequency
4,4'-DDT	0.1	0.034	386	CAR	below cleanup level
methoxychlor	0.05	0.017	1.75E+04	NCAR	<=5% detection frequency
alpha-chlordane	0.1	0.027	101	CAR	below cleanup level

NCAR - non-carcinogen
CAR - carcinogen
A - Method A
EPA PRG - EPA Preliminary Remediation Goal, Region 9

Table 4: Indicator Substance Screening, Soils

Analyte	Frequency of Detection	Maximum Concentration, mg/kg	MTCA Cleanup Level, mg/kg	Basis	Screening Results
Volatiles					
dichloromethane	0.76	0.0057	1.75E+04	CAR	below cleanup level
acetone	0.71	0.069	3.50E+05	NCAR	below cleanup level
2-butanone	0.08	0.0054	2.10E+06	NCAR	below cleanup level
benzene	0.2	0.0025	4530	CAR	below cleanup level
4-methyl-2-pentanone	0.2	0.016			no toxicity data
2-hexanone	0.07	0.034			no toxicity data
toluene	0.71	0.006	7.00E+05	NCAR	below cleanup level
chlorobenzene	0.08	0.0008	7.00E+04	NCAR	below cleanup level
total xylenes	0.35	0.014	7.00E+06	NCAR	below cleanup level
Semivolatiles					
bis(2-ethylhexyl)phthalate	0.71	0.68	9380	CAR	below cleanup level
anthracene	0.53	0.12	1.05E+06	NCAR	below cleanup level
dibenzofuran	0.62	0.19			no toxicity data
phenanthrene	0.87	0.81			no toxicity data
fluoranthene	0.73	0.18	1.40E+05	NCAR	below cleanup level
pyrene	0.73	0.45	1.05E+05	NCAR	below cleanup level
benzo(a)anthracene	0.38	0.16	18	CAR	below cleanup level
chrysene	0.54	0.17	18	CAR	below cleanup level
phenol	0.6	2.6	2.10E+06	NCAR	below cleanup level
2-methylphenol	0.4	1.1	1.75E+05	NCAR	below cleanup level
4-methylphenol	0.4	0.36	1.75E+04	NCAR	below cleanup level
benzoic acid	0.13	0.96	1.40E+07	NCAR	below cleanup level
naphthalene	0.71	0.72	1.40E+05	NCAR	below cleanup level
2-methylnaphthalene	0.73	0.63			no toxicity data
fluorene	0.53	0.11	1.40E+05	NCAR	below cleanup level
benzo(b-k)fluoranthene	0.08	0.18	18	CAR	below cleanup level
benzo(a)pyrene	0.08	0.066	18	CAR	below cleanup level

NCAR - non-carcinogen
CAR - carcinogen

7.0 COMPLIANCE MONITORING PLAN

Compliance monitoring is required at the Site to ensure that residual contaminants in site soils do not move or affect other site media.

7.1 Sampling and Analysis Plan

The requirements of the sampling and analysis plan are outlined in WAC 173-340-820. The plan will consist of groundwater monitoring of wells MW-1 and MW-4 for one year to confirm that the aquifer remains unaffected by residual metals in site soils. Water samples will be collected quarterly, beginning in March 1999, and tested for the eight Resource Conservation and Recovery Act (RCRA) metals (silver, arsenic, barium, boron, chromium, copper, manganese, and lead). These are the metals and non-metallic elements that were detected in previous groundwater sampling. Samples will be analyzed with the EPA Methods used in the previous investigations by Dames & Moore. Sampling techniques and quality assurance/quality control procedures shall also be similar to those used previously.

Chapter 173-340-720(8)(a) WAC states that unfiltered inorganic samples are required for compliance monitoring unless the following can be demonstrated: a properly constructed monitoring well cannot be sufficiently developed to provide low turbidity water samples, or unfiltered samples are not representative due to natural background levels in the aquifer material. At this site, turbidity is high in samples collected from properly constructed and developed wells. Therefore, lab-filtered samples will be permitted for compliance monitoring.

7.2 Periodic Review

After one year, the data will be reviewed by Ecology to determine if compliance monitoring should continue.

8.0 REFERENCES CITED

Dames & Moore, 1998, Final Phase I Remedial Investigation, Old Inland Pit, Spokane WA

Ecology & Environment Inc., 1985, Preliminary Site Inspection Report of Spokane Steel Foundry Company Spokane, WA

Environmental Protection Agency, 1996, Region 9 Preliminary Remediation Goals (PRG) Table Mailing List